

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TERRENCE J. HANCOCK, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 13 C 4044
	)	
C. SZABO CONTRACTING, INC.,	)	JUDGE HARRY D. LEINENWEBER
an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF PARTIAL JUDGMENT AND FOR AN  
ORDER DIRECTING DEFENDANT TO TURN OVER  
MONTHLY FRINGE BENEFIT CONTRIBUTION REPORTS**

NOW COME Plaintiffs, by their attorneys, default having been entered against the Defendant on December 12, 2013, request this Court enter partial judgment against Defendant, C. SZABO CONTRACTING, INC., an Illinois corporation, in the amount of \$31,164.84, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,740.00.

Further, Plaintiffs move for entry of an order directing C. SZABO CONTRACTING, INC., an Illinois corporation, Defendant herein, to turn over monthly fringe benefit contribution reports due for the months of September 2013 through December 2013, pursuant to the Agreements and Declarations of Trust to which Defendant is bound, said Defendant having failed to answer or otherwise plead to the Complaint and the monthly contribution reports being required in order to fully liquidate Plaintiffs' claims.

/s/ Jennifer L. Dunitz-Geiringer

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 8th day of January 2014:

Mr. Carl Szabo, Registered Agent  
C. Szabo Contracting, Inc.  
415 W. Belden Avenue, Suite A  
Addison, IL 60101

/s/ Jennifer L. Dunitz-Geiringer

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